IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BOARD OF PATENT APPEALS AND INTERFERENCES

In Re Application of:

Fischer, et al.

Serial No.: 10/621,557

Filed: July 17, 2003

Confirmation No.: 1331

Group Art Unit: 2616

Examiner: Moore, Ian N.

Docket No.: (50337-1340)

For: **Dynamic Assignment of Station Addresses Transmitted over Shared-Communications Channels**

AMENDED APPEAL BRIEF UNDER 37 C.F.R. §41.31

Mail Stop Appeal Brief - Patents
Commissioner of Patents and Trademarks
P.O. Box 1450
Alexandria, Virginia 22313-1450

Sir:

This is an amended appeal from the decision of Examiner Moore, Group Art Unit 2616, mailed November 14, 2007, rejecting claims 1-20 in the present application and making the rejection FINAL and in response to the Notification of Non-Compliant Appeal Brief of May 15, 2008.

I. REAL PARTY IN INTEREST

The real party in interest of the instant application is Conexant Systems, Inc., having its principal place of business at 4000 MacArthur Blvd., Newport Beach, California 92660.

II. RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences.

III. STATUS OF THE CLAIMS

Claims 1-20 stand rejected. Claims 1-20 are appealed.

IV. STATUS OF AMENDMENTS

Claims 1, 6, 11, 16, and 18 have been amended during prosecution. However, clarification amendments to claims 6 and 16 were not entered because they were in response to a Final Office Action and allegedly raise new issues. Therefore, the Examiner refused the entry of the amendments. A copy of the current claims without the after final clarifying amendments is attached hereto in the Claims – Appendix.

V. SUMMARY OF CLAIMED SUBJECT MATTER

Claim 1 recites a method comprising: receiving a first frame from a station in a local area network (See, for example, FIG. 5 and Specification, para. 41-43), wherein said first frame uses a first address as a medium access control address for said station in said local area network (See, for example, FIG. 5 and Specification, para. 43); assigning an association identifier to said station (See, for example, FIG. 5 and Specification, para. 44-46); transmitting a second frame to said station via said local area network (See, for example, FIG. 5 and Specification, para. 47), wherein said second frame comprises said association identifier and uses said first address as the medium access control address for said station in said local area network (See, for example, FIG. 5 and Specification, para. 47); and receiving a third frame from said station via said local area network (See, for example, FIG. 5 and Specification, para. 51), wherein said third frame uses a second address, rather than said first address, as the medium access control address for said station in said local area network (See, for example, FIG. 5 and Specification, para. 49-50); wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier (See, for example, FIG. 5 and Specification, para. 49-50).

Claim 6 recites a method comprising: transmitting a first frame from a station in a local area network (See, for example, FIG. 5 and Specification, para. 40-50), wherein said first frame uses a first address as a medium access control address for said station in said local area network (See, for example, FIG. 5 and Specification, para. 40-50); receiving a second frame at said station via said local area network (See, for example,

FIG. 5 and Specification, para. 40-50), wherein said second frame comprises an association identifier and uses said first address as the medium control access address for said station in said local area network (See, for example, FIG. 5 and Specification, para. 40-50); transmitting a third frame from said station via said local area network, wherein said third frame uses a second address, rather than said first address, as the medium access control address for said station in said local area network (See, for example, FIG. 5 and Specification, para. 40-50); wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier (See, for example, FIG. 5 and Specification, para. 40-50).

Claim 11 recites an apparatus comprising: a receiver (See, for example, FIG. 4 and Specification, para. 32) for: receiving a first frame from a station in a local area network (See, for example, FIG. 5 and Specification, para. 40-50), wherein said first frame uses a first address as a medium access control address for said station in said local area network (See, for example, FIG. 5 and Specification, para. 40-50), and receiving a third frame from said station via said local area network (See, for example, FIG. 5 and Specification, para. 40-50), wherein said third frame uses a second address, rather than said first address, as the medium access control address for said station in said local area network (See, for example, FIG. 5 and Specification, para. 40-50); a processor for assigning an association identifier to said station (See, for example, FIG. 5 and Specification, para. 40-50); and a transmitter (See, for example, FIG. 4 and Specification, para. 30) for: transmitting a second frame to said station via said local area network (See, for example, FIG. 5 and Specification, para. 40-50), wherein said

second frame comprises said association identifier and uses said first address as the medium access control address for said station in said local area network (See, for example, FIG. 5 and Specification, para. 40-50); wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier (See, for example, FIG. 5 and Specification, para. 40-50).

Claim 16 recites an apparatus comprising: a transmitter (See, for example, FIG. 4 and Specification, para. 30) for: transmitting a first frame from the apparatus in a local area network (See, for example, FIG. 5 and Specification, para. 40-50), wherein said first frame uses a first address as a medium access control address for said apparatus in said local area network (See, for example, FIG. 5 and Specification, para. 40-50), and transmitting a third frame from said apparatus via said local area network (See, for example, FIG. 5 and Specification, para. 40-50), wherein said third frame uses a second address, rather than said first address, as the medium access control address for said apparatus in said local area network (See, for example, FIG. 5 and Specification, para. 40-50); and a receiver (See, for example, FIG. 4 and Specification, para. 32) for: receiving a second frame at said apparatus via said local area network (See, for example, FIG. 5 and Specification, para. 40-50), wherein said second frame comprises an association identifier and uses said first address as the medium control access address for said apparatus in said local area network (See, for example, FIG. 5 and Specification, para. 40-50); wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier (See, for example, FIG. 5 and Specification, para. 40-50).

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Claims 1-3, 5-8, 10-13, 15-18, and 20 are rejected under 35 U.S.C. 102(e) as allegedly being anticipated by *Donaghey* (U.S. Patent No. 6,804,232).

Claims 4, 9, 14, and 19 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over *Donaghey* (U.S. Patent No. 6,804,232) in view of *Cannon* (U.S. Patent No. 6,067,444).

VII. ARGUMENT

A. Claims 1-3, 5-8, 10-13, 15-18, and 20 are allowable under 35 U.S.C. §102(e) in view of *Donaghey*

1. Claims 1-3 and 5

The Office Action rejects claims 1-3 and 5 under 35 U.S.C. §102(e) as allegedly being anticipated by *Donaghey* (U.S. Patent No. 6,804,232). For at least the reasons set forth below, Applicants respectfully traverse the rejection.

Independent claim 1 recites:

1. A method comprising:
receiving a first frame from a station in a local area network, wherein said first frame uses a first address as a medium access control address for said station in said local area network;
assigning an association identifier to said station;
transmitting a second frame to said station via said local area network, wherein said second frame comprises said association identifier and uses said first address as the medium access control address for said station in said local area network; and
receiving a third frame from said station via said local area network,

> ***wherein said third frame uses a second address, rather than said first address, as the medium access control address for said station in said local area network;***
> ***wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier.***

(Emphasis added).

Applicants respectfully submit that claim 1 is patentably distinct from the cited art for at least the reason that the cited art does not disclose the features emphasized above. For a proper rejection of a claim under 35 U.S.C. §102, the cited reference must disclose, teach, or suggest all elements/features of the claim at issue. *See, e.g., E.I. du Pont de Nemours & Co. v. Phillips Petroleum Co.*, 849 F.2d 1430, 7 U.S.P.Q.2d 1129 (Fed. Cir. 1988).

Applicants respectfully submit that independent claim 1 is allowable for at least the reason that *Donaghey* does not disclose, teach, or suggest at least **receiving a third frame from said station via said local area network, wherein said third frame uses a second address, rather than said first address, as the medium access control address for said station in said local area network; wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier**. Even if, assuming for the sake of argument, *Donaghey* discloses using a second address, *Donaghey* fails to disclose wherein the second address is a combination of a portion of the first address and at least a portion of the association identifier. In *Donaghey*, the stream number is assigned to the communication received or sent from the PEA; the stream number is not assigned to the PEA itself:

> The Hub LLT 440, through the Hub LLD 450, instructs the Hub DCL 460 which MAC addresses and stream numbers to combine into tokens and transmit so that the correct PEA 120 will respond.

See Donaghey, col. 8, lines 14-25.

> The MAC address 610 and stream number 620 form the contents of a token 640. When the LLD 450 reads from and writes to the hardware DCL 460, the LLD 450 communicates the MAC address 610 and stream number 620 with the data buffer 630. When a PEA 120 receives a data block, the DCL 460 places the MAC address 610 and stream number 620 contained in the preceding token 640 in the data block 600 to keep track of the different data flows.

See Donaghey, col. 8, lines 14-25.

> Each token 640 (FIG. 6) transmitted by the Hub 110 in a token broadcast 820 includes a MAC address 610 (FIG. 6) and a stream number 620 for the data buffer 630 transfer that follows. The MAC address 610 and stream number 620 in the token 640 together specify a particular PEA 120 to transmit or receive data , or, in the case of the Hub's MAC address 610, specify no, many, or all PEAs

> to receive data from the Hub 110 (depending on the stream number). The stream number 620 in the token 640 indicates the direction of the data transfer 830 (Hub 110 to PEA 120 or PEA 120 to Hub 110), the number of bytes to be transferred, and the data source (for the sender) and the appropriate empty data block (for the receiver).

See Donaghey, col. 8, lines 14-25.

Conversely, according to the instant claim, the association identifier is assigned to the *station*. Therefore, *Donaghey* does not anticipate independent claim 1, and the rejection should be withdrawn for at least that reason.

For at least the reason that independent claim 1 is allowable over the cited references of record, dependent claims 2, 3, and 5 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that dependent claims 2, 3, and 5 contain all the features of independent claim 1. *See Minnesota Mining and Manufacturing Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002) *Jeneric/Pentron, Inc. v. Dillon Co.*, 205 F.3d 1377, 54 U.S.P.Q.2d 1086 (Fed. Cir. 2000); *Wahpeton Canvas Co. v. Frontier Inc.*, 870 F.2d 1546, 10 U.S.P.Q.2d 1201 (Fed. Cir. 1989). Therefore, since dependent claims 2, 3, and 5 are patentable over *Donaghey*, the rejection of claims 2, 3, and 5 should be withdrawn and the claims allowed.

B. Claims 6-8 and 10

The Office Action rejects claims 6-8 and 10 under 35 U.S.C. §102(e) as allegedly being anticipated by *Donaghey* (U.S. Patent No. 6,804,232). For at least the reasons set forth below, Applicants respectfully traverse the rejection.

Independent claim 6, as amended, recites:

6. A method comprising:
transmitting a first frame from a station in a local area network, wherein said first frame uses a first address as a medium access control address for said station in said local area network;
receiving a second frame at said station via said local area network, wherein said second frame comprises an association identifier and uses said first address as the medium control access address for said station in said local area network;
transmitting a third frame from said station via said local area network, wherein said third frame uses a second address, rather than said first address, as the medium access control address for said station in said local area network;
wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier.

(Emphasis added).

Applicants respectfully submit that claim 6 is patentably distinct from the cited art for at least the reason that the cited art does not disclose the features emphasized above. For a proper rejection of a claim under 35 U.S.C. §102, the cited reference must disclose, teach, or suggest all elements/features of the claim at issue.

Applicants respectfully submit that independent claim 6 is allowable for at least the reason that *Donaghey* does not disclose, teach, or suggest at least **transmitting a third frame from said station via said local area network, wherein said third frame uses a second address, rather than said first address, as the medium access control address for said station in said local area network; wherein said second address is a combination of (1) a portion of said first address and (2) at least a**

portion of said association identifier. Even if, assuming for the sake of argument, *Donaghey* discloses using a second address, *Donaghey* fails to disclose wherein the second address is a combination of a portion of the first address and at least a portion of an association identifier. In *Donaghey*, the stream number is assigned to the communication received or sent from the PEA; the stream number is not assigned to the PEA itself:

> The Hub LLT 440, through the Hub LLD 450, instructs the Hub DCL 460 which MAC addresses and stream numbers to combine into tokens and transmit so that the correct PEA 120 will respond.

See Donaghey, col. 8, lines 14-25.

> The MAC address 610 and stream number 620 form the contents of a token 640. When the LLD 450 reads from and writes to the hardware DCL 460, the LLD 450 communicates the MAC address 610 and stream number 620 with the data buffer 630. When a PEA 120 receives a data block, the DCL 460 places the MAC address 610 and stream number 620 contained in the preceding token 640 in the data block 600 to keep track of the different data flows.

See Donaghey, col. 8, lines 14-25.

> Each token 640 (FIG. 6) transmitted by the Hub 110 in a token broadcast 820 includes a MAC address 610 (FIG. 6) and a stream

> number 620 for the data buffer 630 transfer that follows. The MAC address 610 and stream number 620 in the token 640 together specify a particular PEA 120 to transmit or receive data , or, in the case of the Hub's MAC address 610, specify no, many, or all PEAs to receive data from the Hub 110 (depending on the stream number). The stream number 620 in the token 640 indicates the direction of the data transfer 830 (Hub 110 to PEA 120 or PEA 120 to Hub 110), the number of bytes to be transferred, and the data source (for the sender) and the appropriate empty data block (for the receiver).

See Donaghey, col. 8, lines 14-25.

Conversely, according to the instant claim, the association identifier is assigned to the *station*. Therefore, *Donaghey* does not anticipate independent claim 6, and the rejection should be withdrawn for at least that reason.

For at least the reason that independent claim 6 is allowable over the cited references of record, dependent claims 7, 8, and 10 (which depend from independent claim 6) are allowable as a matter of law for at least the reason that dependent claims 7, 8, and 10 contain all the features of independent claim 6. Therefore, since dependent claims 7, 8, and 10 are patentable over *Donaghey*, the rejection of claims 7, 8, and 10 should be withdrawn and the claims allowed.

C. Claims 11-13 and 15

The Office Action rejects claims 11-13 and 15 under 35 U.S.C. §102(e) as allegedly being anticipated by *Donaghey* (U.S. Patent No. 6,804,232). For at least the reasons set forth below, Applicants respectfully traverse the rejection.

Independent claim 11 recites:

11. An apparatus comprising:
    (1) a receiver for:
        (i) receiving a first frame from a station in a local area network, wherein said first frame uses a first address as a medium access control address for said station in said local area network, and
        (ii) receiving a third frame from said station via said local area network, wherein said third frame uses a second address, rather than said first address, as the medium access control address for said station in said local area network;
    (2) a processor for assigning an association identifier to said station; and
    (3) ***a transmitter for:***
    transmitting a second frame to said station via said local area network, wherein said second frame comprises said association identifier and uses said first address as the medium access control address for said station in said local area network;
    wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier.

(Emphasis added).

Applicants respectfully submit that claim 11 is patentably distinct from the cited art for at least the reason that the cited art does not disclose the features emphasized above. For a proper rejection of a claim under 35 U.S.C. §102, the cited reference must disclose, teach, or suggest all elements/features of the claim at issue.

Applicants respectfully submit that independent claim 11 is allowable for at least the reason that *Donaghey* does not disclose, teach, or suggest at least ***a transmitter***

for: transmitting a second frame to said station via said local area network, wherein said second frame comprises said association identifier and uses said first address as the medium access control address for said station in said local area network; wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier. Even if, assuming for the sake of argument, *Donaghey* discloses using a second address, *Donaghey* fails to disclose wherein the second address is a combination of a portion of the first address and at least a portion of an association identifier. In *Donaghey*, the stream number is assigned to the communication received or sent from the PEA; the stream number is not assigned to the PEA itself:

> The Hub LLT 440, through the Hub LLD 450, instructs the Hub DCL 460 which MAC addresses and stream numbers to combine into tokens and transmit so that the correct PEA 120 will respond.

See Donaghey, col. 8, lines 14-25.

> The MAC address 610 and stream number 620 form the contents of a token 640. When the LLD 450 reads from and writes to the hardware DCL 460, the LLD 450 communicates the MAC address 610 and stream number 620 with the data buffer 630. When a PEA 120 receives a data block, the DCL 460 places the MAC address 610 and stream number 620 contained in the preceding token 640 in the data block 600 to keep track of the different data flows.

See Donaghey, col. 8, lines 14-25.

> Each token 640 (FIG. 6) transmitted by the Hub 110 in a token broadcast 820 includes a MAC address 610 (FIG. 6) and a stream number 620 for the data buffer 630 transfer that follows. The MAC address 610 and stream number 620 in the token 640 together specify a particular PEA 120 to transmit or receive data , or, in the case of the Hub's MAC address 610, specify no, many, or all PEAs to receive data from the Hub 110 (depending on the stream number). The stream number 620 in the token 640 indicates the direction of the data transfer 830 (Hub 110 to PEA 120 or PEA 120 to Hub 110), the number of bytes to be transferred, and the data source (for the sender) and the appropriate empty data block (for the receiver).

See Donaghey, col. 8, lines 14-25.

Conversely, according to the instant claim, the association identifier is assigned to the *station*. Therefore, *Donaghey* does not anticipate independent claim 11, and the rejection should be withdrawn for at least that reason.

For at least the reason that independent claim 11 is allowable over the cited references of record, dependent claims 12, 13, and 15 (which depend from independent claim 11) are allowable as a matter of law for at least the reason that dependent claims 12, 13, and 15 contain all the features of independent claim 11. Therefore, since dependent

claims 12, 13, and 15 are patentable over *Donaghey*, the rejection of claims 12, 13, and 15 should be withdrawn and the claims allowed.

D. Claims 16-18 and 20

The Office Action rejects claims 16-18 and 20 under 35 U.S.C. §102(e) as allegedly being anticipated by *Donaghey* (U.S. Patent No. 6,804,232). For at least the reasons set forth below, Applicants respectfully traverse the rejection.

Independent claim 16, as amended, recites:

16. An apparatus comprising:
    (1) a transmitter for:
        (i) transmitting a first frame from the apparatus in a local area network, wherein said first frame uses a first address as a medium access control address for said apparatus in said local area network, and
        (ii) transmitting a third frame from said apparatus via said local area network, wherein said third frame uses a second address, rather than said first address, as the medium access control address for said apparatus in said local area network; and
    (2) ***a receiver for:***
        receiving a second frame at said via apparatus said local area network, wherein said second frame comprises an association identifier and uses said first address as the medium control access address for said apparatus in said local area network;
    wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier.

(Emphasis added).

Applicants respectfully submit that claim 16 is patentably distinct from the cited art for at least the reason that the cited art does not disclose the features emphasized above. For a proper rejection of a claim under 35 U.S.C. §102, the cited reference must disclose, teach, or suggest all elements/features of the claim at issue.

Applicants respectfully submit that independent claim 16 is allowable for at least the reason that *Donaghey* does not disclose, teach, or suggest at least **a receiver for: receiving a second frame at said via apparatus said local area network, wherein said second frame comprises an association identifier and uses said first address as the medium control access address for said apparatus in said local area network; wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier**. Even if, assuming for the sake of argument, *Donaghey* discloses using a second address, *Donaghey* fails to disclose a receiver for: receiving a second frame at said via apparatus said local area network, wherein said second frame comprises an association identifier and uses said first address as the medium control access address for said apparatus in said local area network; wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier. In *Donaghey*, the stream number is assigned to the communication received or sent from the PEA; the stream number is not assigned to the PEA itself:

> The Hub LLT 440, through the Hub LLD 450, instructs the Hub DCL 460 which MAC addresses and stream numbers to combine into tokens and transmit so that the correct PEA 120 will respond.

See Donaghey, col. 8, lines 14-25.

> The MAC address 610 and stream number 620 form the contents of a token 640. When the LLD 450 reads from and writes to the hardware DCL 460, the LLD 450 communicates the MAC address 610 and stream number 620 with the data buffer 630. When a PEA 120 receives a data block, the DCL 460 places the MAC address 610 and stream number 620 contained in the preceding token 640 in the data block 600 to keep track of the different data flows.

See Donaghey, col. 8, lines 14-25.

> Each token 640 (FIG. 6) transmitted by the Hub 110 in a token broadcast 820 includes a MAC address 610 (FIG. 6) and a stream number 620 for the data buffer 630 transfer that follows. The MAC address 610 and stream number 620 in the token 640 together specify a particular PEA 120 to transmit or receive data , or, in the case of the Hub's MAC address 610, specify no, many, or all PEAs to receive data from the Hub 110 (depending on the stream number). The stream number 620 in the token 640 indicates the direction of the data transfer 830 (Hub 110 to PEA 120 or PEA 120 to Hub 110), the number of bytes to be transferred, and the data source (for the sender) and the appropriate empty data block (for

the receiver).

See Donaghey, col. 8, lines 14-25.

Conversely, according to the instant claim, the association identifier is assigned to the *station*. Therefore, *Donaghey* does not anticipate independent claim 16, and the rejection should be withdrawn for at least that reason.

For at least the reason that independent claim 16 is allowable over the cited references of record, dependent claims 17, 18, and 20 (which depend from independent claim 16) are allowable as a matter of law for at least the reason that dependent claims 17, 18, and 20 contain all the features of independent claim 16. Therefore, since dependent claims 17, 18, and 20 are patentable over *Donaghey*, the rejection of claims 17, 18, and 20 should be withdrawn and the claims allowed.

B. Claims 4, 9, 14, and 19 are allowable under 35 U.S.C. §103(a) in view of *Donaghey* and *Cannon*

1. Claim 4

The Office Action rejects claims 4 under 35 U.S.C. §103(a) as allegedly being unpatentable over *Donaghey* (U.S. Patent No. 6,804,232) in view of *Cannon* (U.S. Patent No. 6,067,444). For at least the reasons set forth below, Applicants respectfully traverse the rejection.

For at least the reason that independent claim 1 is allowable over the cited references of record, dependent claim 4 (which depends from independent claim 1) is allowable as a matter of law for at least the reason that dependent claim 4 contains all the

features of independent claim 1. Therefore, the rejection of claim 4 should be withdrawn and the claim allowed.

Additionally, with regard to the rejection of claim 4, *Cannon* does not make up for the deficiencies of *Donaghey* noted above. Therefore, claim 4 is considered patentable over any combination of these documents for at least the reason that claim 4 incorporates allowable features of claim 1 as set forth above.

2. Claim 9

The Office Action rejects claims 9 under 35 U.S.C. §103(a) as allegedly being unpatentable over *Donaghey* (U.S. Patent No. 6,804,232) in view of *Cannon* (U.S. Patent No. 6,067,444). For at least the reasons set forth below, Applicants respectfully traverse the rejection.

For at least the reason that independent claim 6 is allowable over the cited references of record, dependent claim 9 (which depends from independent claim 6) is allowable as a matter of law for at least the reason that dependent claim 9 contains all the features of independent claim 6. Therefore, the rejection of claim 9 should be withdrawn and the claim allowed.

Additionally, with regard to the rejection of claim 9, *Cannon* does not make up for the deficiencies of *Donaghey* noted above. Therefore, claim 9 is considered patentable over any combination of these documents for at least the reason that claim 9 incorporates allowable features of claim 6 as set forth above.

3. Claim 14

The Office Action rejects claims 14 under 35 U.S.C. §103(a) as allegedly being unpatentable over *Donaghey* (U.S. Patent No. 6,804,232) in view of *Cannon* (U.S. Patent No. 6,067,444). For at least the reasons set forth below, Applicants respectfully traverse the rejection.

For at least the reason that independent claim 11 is allowable over the cited references of record, dependent claim 14 (which depends from independent claim 11) is allowable as a matter of law for at least the reason that dependent claim 14 contains all the features of independent claim 11. Therefore, the rejection of claim 14 should be withdrawn and the claim allowed.

Additionally, with regard to the rejection of claim 14, *Cannon* does not make up for the deficiencies of *Donaghey* noted above. Therefore, claim 14 is considered patentable over any combination of these documents for at least the reason that claim 14 incorporates allowable features of claim 11 as set forth above.

4. Claim 19

The Office Action rejects claims 19 under 35 U.S.C. §103(a) as allegedly being unpatentable over *Donaghey* (U.S. Patent No. 6,804,232) in view of *Cannon* (U.S. Patent No. 6,067,444). For at least the reasons set forth below, Applicants respectfully traverse the rejection.

For at least the reason that independent claim 16 is allowable over the cited references of record, dependent claim 19 (which depends from independent claim 16) is allowable as a matter of law for at least the reason that dependent claim 19 contains all the

features of independent claim 16. Therefore, the rejection of claim 19 should be withdrawn and the claim allowed.

Additionally, with regard to the rejection of claim 19, *Cannon* does not make up for the deficiencies of *Donaghey* noted above. Therefore, claim 19 is considered patentable over any combination of these documents for at least the reason that claim 19 incorporates allowable features of claim 16 as set forth above.

CONCLUSION

Based upon the foregoing discussion, Applicants respectfully request that the Examiner's final rejection of claims 1-20 be overruled by the Board, and that the application be allowed to issue as a patent with all pending claims.

No additional fee is believed to be due in connection with this appeal other than those that have already been paid. If, however, any additional fee is deemed to be payable, you are hereby authorized to charge any such fee to deposit account 20-0778.

Respectfully submitted,

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VIII. CLAIMS - APPENDIX

1. (Previously Presented) A method comprising:

receiving a first frame from a station in a local area network, wherein said first frame uses a first address as a medium access control address for said station in said local area network;

assigning an association identifier to said station;

transmitting a second frame to said station via said local area network, wherein said second frame comprises said association identifier and uses said first address as the medium access control address for said station in said local area network; and

receiving a third frame from said station via said local area network, wherein said third frame uses a second address, rather than said first address, as the medium access control address for said station in said local area network;

wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier.

2. (Original) The method of claim 1 wherein said association identifier is unique among the stations that are currently active in said local area network.

3. (Original) The method of claim 1 further comprising transmitting a fourth frame to said station via said local area network, wherein said fourth frame uses said second address as the medium access control address for said station in said local area network.

4. (Original) The method of claim 1 wherein said association identifier is 11 bits in length.

5. (Original) The method of claim 1 wherein said first address is 48 bits in length.

6. (Previously Presented) A method comprising:

transmitting a first frame from a station in a local area network, wherein said first frame uses a first address as a medium access control address for said station in said local area network;

receiving a second frame at said station via said local area network, wherein said second frame comprises an association identifier and uses said first address as the medium control access address for said station in said local area network;

transmitting a third frame from said station via said local area network, wherein said third frame uses a second address, rather than said first address, as the medium access control address for said station in said local area network;

wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier.

7. (Original) The method of claim 6 wherein said association identifier is unique among the stations that are currently active in said local area network.

8. (Original) The method of claim 6 further comprising receiving a fourth frame at said station via said local area network, wherein said fourth frame uses said second address as the medium access control address for said station in said local area network.

9. (Original) The method of claim 6 wherein said association identifier is 11 bits in length.

10. (Original) The method of claim 6 wherein said first address is 48 bits in length.

11. (Previously Presented) An apparatus comprising:

(1) a receiver for:

(i) receiving a first frame from a station in a local area network, wherein said first frame uses a first address as a medium access control address for said station in said local area network, and

(ii) receiving a third frame from said station via said local area network, wherein said third frame uses a second address, rather than said first address, as the medium access control address for said station in said local area network;

(2) a processor for assigning an association identifier to said station; and

(3) a transmitter for:

transmitting a second frame to said station via said local area network, wherein said second frame comprises said association identifier and uses said first address as the medium access control address for said station in said local area network;

wherein said second address is a combination of (1) a portion of said first

address and (2) at least a portion of said association identifier.

12. (Original) The apparatus of claim 11 wherein said association identifier is unique among the stations that are currently active in said local area network.

13. (Original) The apparatus of claim 11 wherein said transmitter is also for (ii) transmitting a fourth frame to said station via said local area network, wherein said fourth frame uses said second address as the medium access control address for said station in said local area network.

14. (Original) The apparatus of claim 11 wherein said association identifier is 14 bits in length.

15. (Original) The apparatus of claim 11 wherein said first address is 48 bits in length.

16. (Previously Presented) An apparatus comprising:

(1) a transmitter for:

(ii) transmitting a first frame from the apparatus in a local area network, wherein said first frame uses a first address as a medium access control address for said apparatus in said local area network, and

(iii) transmitting a third frame from said apparatus via said local area network, wherein said third frame uses a second address, rather than said first address, as the medium access control address for said apparatus in said local area network; and

(2) a receiver for:

receiving a second frame at said apparatus via said local area network, wherein said second frame comprises an association identifier and uses said first address as the medium control access address for said apparatus in said local area network;

wherein said second address is a combination of (1) a portion of said first address and (2) at least a portion of said association identifier.

17. (Original) The apparatus of claim 16 wherein said association identifier is unique among the stations that are currently active in said local area network.

18. (Previously Presented) The apparatus of claim 16 wherein said receiver is further for (ii) receiving a fourth frame at said apparatus via said local area network, wherein said fourth frame uses said second address as the medium access control address for said apparatus in said local area network.

19. (Original) The apparatus of claim 16 wherein said association identifier is 11 bits in length.

20. (Original) The apparatus of claim 16 wherein said first address is 48 bits in length.

IX. EVIDENCE - APPENDIX

None.

X. RELATED PROCEEDINGS - APPENDIX

None.